

EXHIBIT A



DISTRICT COURT OF MARYLAND
ANNE ARUNDEL COUNTY
 George M. Taylor Multi-Service Center
 7500 Gov. Ritchie Highway
 Glen Burnie, Maryland 21061

Case 1:20-cv-01605-DKC Document 1-1 Filed 11/24/20 Page 1 of 1
 Toll-free (In-state only): 1-800-944-2688
 Maryland Relay call: 711

Case Number: D-07-CV-20-016055

ERAMOSI OYATHELEMI VS. LJ ROSS AND ASSOCIATES

WRIT OF SUMMONS

LJ ROSS AND ASSOCIATES
 Serve on: CSC-LAWYERS INC SERVICES
 7 ST PAUL STREET
 SUITE 820
 BALTIMORE, MD 21202

Date Filed: 10/27/2020
 Issue Date: 10/30/2020
 Trial Date: 1/28/2021
 Trial Time: 8:45 AM
 Trial Room: 05

You are summoned to appear for trial at the date, time, and location shown above. **If you intend to be present at the trial, you must file the attached Notice of Intention to Defend within ☐ 15 days ☒ 60 days of receiving this complaint.** Failure to file the Notice of Intention to Defend may result in a judgment by default or the granting of the relief sought.

MUST BE SERVED BY: 11/29/2020

Tamera Chester
 Administrative Clerk

To ☐ Sheriff/Constable ☐ Private Process Server

You are hereby commanded to serve this Writ of Summons and to make your return promptly if served. If you are unable to serve, you are to make your return below and return the original process to the court no later than ten (10) days following the termination of the validity of the process.

I certify that:

☐ I served a summons by delivery of the complaint and all supporting papers to: _____
 Name
 on _____ ☐ A.M. ☐ P.M. at _____
 Date Time Location

The person I left the papers with acknowledged being: (1) A resident of above listed address; (2) 18 years of age or older; (3) of suitable discretion in that relationship to the Defendant is _____;
 and that (4) the above listed address is the Defendant's residence or usual place of abode. The facts upon which I concluded that the individual served is of suitable age discretion are: _____

The cost of service is \$ _____

Description of the Defendant/Person Served: Race _____ Sex _____ Ht. _____ Wt. _____ Age _____

☐ I was unable to serve because _____

Attempt: _____ Attempt: _____ Attempt: _____ Attempt: _____

REFUND TO:

I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information, and belief and do further affirm I am a competent person over 18 years of age and not party to the case.

Print Name of Process Server

Address

City, State, Zip

Telephone

Signature of Process Server

Date

"Insert Barcode Here"

NOTICE OF INTENTION TO DEFEND

Case Number: D-07-CV-20-016055

Defendant: LJ ROSS AND ASSOCIATES

Trial Date: 1/28/2021

NOTICE: If you contest the claim or any part thereof, you must complete this Notice of Intention to Defend and file with the court listed at the top of this summons no later than ☐ 15 days ☒ 60 days after you receive this Summons and be present in court on the trial date. If you do not appear, judgment by default or the relief sought may be granted.

ATTENTION CORPORATIONS & LLCs: this Notice must be filed by an attorney, and you must be represented at trial by an attorney. **EXCEPTION:** where the amount claimed doesn't exceed \$5,000.00, corporations may be represented by an officer; LLCs may be represented by a member. Both may be represented by a properly designated employee. See Maryland Annotated Code, Business Occupations and Professions, § 10-206(b)(4) for further details, and for information regarding partnerships and sole proprietorships.

To request a foreign language interpreter or a reasonable accommodation under the Americans with Disabilities Act, please contact the court immediately. Possession and use of cell phones and other electronic devices may be limited or prohibited in designated areas of the court facility.

SEE NOTICE TO DEFENDANT ON COMPLAINT FORM FOR IMPORTANT INFORMATION

I intend to be present at the trial of this claim and demand proof of the Plaintiff's claim.

Brief explanation of defense:

Date

Signature

Printed Name

Address

City, State, Zip

Home/Work Telephone Number

Fax

Email



DISTRICT COURT OF MARYLAND FOR

LOCATED AT (COURT ADDRESS)

7500 Richie Hwy
Green Borne MD 21064

CASE NO.

CVD-07-CV-20-016055

PARTIES

Plaintiff

Eramosi Oyathelemi

P.O. BOX 3170

Crofton MD 21114

VS.

Defendant(s):

1. LJ Ross and Associates

CSC-LAWYERS INCORPORATING SERVICE
COMPANY

7 ST. PAUL STREET

SUITE 820

Baltimore MD 21202

Serve by:

- ☒ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

Serve by:

- ☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

Serve by:

- ☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

Serve by:

- ☐ Certified Mail
☐ Private Process
☐ Constable
☐ Sheriff

ATTORNEYS

For Plaintiff - Name, Address, Telephone Number & Code

COMPLAINT/APPLICATION AND AFFIDAVIT
IN SUPPORT OF JUDGMENT☐ \$5,000 or under ☒ over \$5,000 ☐ over \$10,000Clerk: Please docket this case in an action of ☐ contract ☐ tort
☐ replevin ☐ detinue ☐ bad faith insurance claim

The particulars of this case are:

LJ Ross is a debt collection agency. Although they are aware that their records are inaccurate; they continue to CERTIFY that I owe their client, BGE \$3022. I have asked for a ledger/accounting of the debt so that I may check against past records. They refused to provide one. They only sent a one page bill balance sheet of \$3,022 w/no explanation of the amount. I called several times to dispute the account directly. I was talked to as a child; belittled and scolded by their manager Nick. He claimed that I had never made a single payment to their client and until I could provide proof that I had made any payment; they would continue to CERTIFY to the credit bureaus that the record was accurate. I then provided proof from their client of my claims; they THEN mailed three months of bills that contradicted their own records. They argued that although their data was wrong, the debt was accurate; they said that the majority of the debt amount was from a completely separate account that they do not have access to, yet continue to CERTIFY as accurate. I now come asking the court to grant injunctive relief; ordering LJ Ross to cease reporting an unverifiable debt to the credit bureaus and that pay \$7500 in damages for bad faith collection practice, pain and suffering, & legal fees.

(See Continuation Sheet)

The plaintiff claims \$6000, plus interest of \$ _____, interest at the ☐ legal rate ☐ contractual rate calculated at _____ %, from _____ to _____ (_____ days x \$ _____ per day) and attorney's fees of \$1500 plus court costs.

- ☐ Return of the property and damages of \$ _____ for its detention in an action of replevin.
☐ Return of the property, or its value, plus damages of \$ _____ for its detention in action of detinue.
☒ Other: Cease reporting inaccurate debt to all Credit Bureaus and demands judgment for relief.

Signature of Plaintiff/Attorney/Attorney Code

CPF ID No.

Printed Name: Eramosi Oyathelemi

Address: PO Box 3170 Crofton, MD 21114

Telephone Number: 601-291-2920

Fax:

E-mail: Oyathelemi@gmail.com

MILITARY SERVICE AFFIDAVIT

- ☐ Defendant(s) _____ is/are in the military service.
☒ No defendant is in the military service. The facts supporting this statement are: This is a business.

Specific facts must be given for the Court to conclude that each Defendant who is a natural person is not in the military.

☐ I am unable to determine whether or not any defendant is in military service.

I hereby declare or affirm under the penalties of perjury that the facts and matters set forth in the foregoing Affidavit are true and correct to the best of my knowledge, information, and belief.

10/26/2020

Date

Signature of Affiant

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGMENT (See Plaintiff Notice on Back Page)

Attached hereto are the indicated documents which contain sufficient detail as to liability and damage to apprise the defendant clearly of the claim against the defendant, including the amount of any interest claimed.

- ☐ Properly authenticated copy of any note, security agreement upon which claim is based ☐ Itemized statement of account ☐ Interest worksheet
☐ Vouchers ☐ Check ☐ Other written document ☐ Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the ☒ plaintiff ☐ _____ of the plaintiff herein and am competent to testify to the matters stated in this Complaint, which are made on my personal knowledge; that there is justly due and owing by the defendant to the plaintiff the sum set forth in the Complaint.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am competent to testify to these matters.

10/26/2020

Date

Signature of Affiant

NOTICE TO DEFENDANT

Before Trial

If you agree that you owe the plaintiff the amount claimed, you may contact the plaintiff (or plaintiff's attorney) before the trial date to arrange payment. If you wish to contest the claim, you should notify the clerk's office by filing a Notice of Intent to Defend (located at the bottom of your summons). The case will be set for trial. If you wish to have your witnesses appear at trial, you should contact the clerk's office at least two weeks before the trial date to request subpoenas, and you should bring to court on the trial date any evidence you want the court to consider. If you do nothing, a judgment could be entered against you.

If Judgment is Entered Against You (If You Lose)

IF YOU DISAGREE WITH THE COURT'S RULING, you may:

1. **APPEAL** to the circuit court, by filing a Notice of Appeal in the District Court within **30 days** after the entry of judgment. You will have to pay a filing fee (see Guide to Appeal Fees, DCA-109A), unless the court determines that you are indigent. If the amount of the claim, not counting court costs, interest, and attorney's fees, is:
 - **more than \$5,000**, you will also have to order and pay for a transcript of the District Court trial record, by contacting the District Court clerk's office (see Transcripts & Recordings Brochure, DCA-027BR).
 - **\$5,000 or less**, you will have a new trial in the circuit court.

On your trial date you should bring with you any evidence that you want the court to consider.

2. File a **MOTION FOR A NEW TRIAL** within **10 days** after the entry of judgment, stating your reasons clearly. If the court denies your motion, you may still file an appeal; if the court grants your motion, you must appear in the District Court for a new trial.
3. File a **MOTION TO ALTER OR AMEND THE JUDGMENT** within **10 days** after entry of judgment.
4. File a **MOTION TO REVISE OR VACATE THE JUDGMENT** within **30 days** after entry of judgment.

IF YOU DECIDE NOT TO APPEAL AND NOT TO FILE ONE OF THE ABOVE MOTIONS, you may contact the plaintiff or plaintiff's attorney to arrange to pay the amount owed. If you do not pay the amount owed, the plaintiff or plaintiff's attorney may initiate further proceedings to enforce the judgment, including:

1. **Interrogatories**: You must answer these written questions about your income and assets in writing under penalties of perjury.
2. **Oral Examination**: You must appear in court to testify in response to questions about your assets and income.
3. **Writ of Execution**: The court may issue a writ requiring the sale or seizure of any of your possessions except, with some exceptions, property that is exempt from execution. The exemptions are explained in detail on the reverse side of the Writ of Execution form, DC-CV-040. Further, the court could order you to pay additional expenses such as towing, moving, storage fees, advertising costs, and auctioneer's fees incurred in executing the writ.
4. **Garnishment of Property**: The court may issue a writ ordering a bank or other agent to hold your assets until further court proceedings.
5. **Garnishment of Wages**: The court may issue a writ ordering your employer to withhold a portion of your wages to pay your debt. The law provides certain exemptions from garnishment.

If you have any questions, you should consult an attorney. The clerk of the court is not permitted to give you legal advice. More information can be found in court brochures located in the clerk's office or online at: http://www.mdcourts.gov/district/public_brochures.html.

NOTICE TO PLAINTIFF

REQUESTING A JUDGMENT BY AFFIDAVIT OR DEFAULT:

Federal Law requires the filing of a military service affidavit. Information about the Servicemembers Civil Relief Act and the required affidavit can be found on the court's website at: <http://mdcourts.gov/reference/scra.html>.

AFTER THE COURT ENTERS A JUDGMENT:

1. If the court enters a judgment for a sum certain, you have the right to file for a lien on real property.
2. If you disagree with the outcome of the case, you have the same post-trial rights as the defendant does: you may file an Appeal, a Motion for New Trial, a Motion to Alter or Amend the Judgment or a Motion to Revise or Vacate the Judgment. See above for further information concerning these rights.

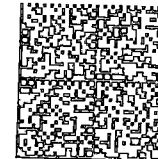
IF UNDELIVERABLE RETURN TO
DISTRICT COURT OF MARYLAND #7-2
7500 RITCHIE HWY
GLEN BURNIE MD 21061-3748



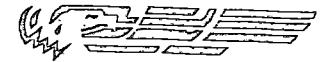
7190 1818 5220 0261 4119

“RESTRICTED DELIVERY”

LJ ROSS AND ASSOCIATES
S/O: CSC-LAWYERS INC SERVICE
7 ST PAUL STREET
SUITE 820
BALTIMORE, MD, 21202



U.S. POSTAGE» PITNEY BOWES



ZIP 21061 \$012.50⁰
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